REMARKS

Claims 1, 2, 4-6, 8-10, 21, and 23-29 are pending in this application. Claims 7, 11-16, 18-20, 30, and 31 have been canceled without prejudice or disclaimer of the subject matter therein. Claims 1, 21, 25, and 29 have been amended. No new matter has been added. Favorable reconsideration and allowance of the standing claims are respectfully requested.

Claims 1, 2, 4-10, 21, and 23-29 were rejected under 35 U.S.C. § 102(e) as being anticipated by United States Patent Number (USPN) 6,772,216 to Ankireddipally et al. ("Ankireddipally"). Applicants respectfully traverse the rejection.

While Applicants disagree with the broad grounds of rejection presented in the Office Action, the independent claims have been amended in order to expedite prosecution on the merits.

Independent claims 1, 21, 25, and 29 have been amended to recite "the first format comprising a first XML format defining a first document type, the second format comprising a second XML format defining the first document type."

Applicants respectfully submit that to anticipate a claim under 35 U.S.C. § 102(e), the cited reference must teach every element of the claim. See e.g., MPEP § 2131.

Applicants submit that Ankireddipally fails to teach each and every element recited in independent claims 1, 21, 25, and 29 as amended. Applicants submit that claims 1, 21, 25, and 29 are allowable for at least this reason and that claims 2, 4-6, 8-10, 23, 24, and 26-28 are allowable by virtue of their dependency, as well as on their own merits.

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Accordingly, removal of the § 102(e) rejection of claims 1, 2, 4-6, 8-10, 21, and 23-29 is requested.

It is believed that claims 1, 2, 4-6, 8-10, 21, and 23-29 are in allowable form.

Accordingly, a timely Notice of Allowance to this effect is earnestly solicited.

The Examiner is invited to contact the undersigned at 724-933-3387 to discuss any matter concerning this application.

The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. § 1.16 or § 1.17 to Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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Under 37 CFR 1.34(a)

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail with sufficient postage in an envelope addressed to:

Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on: $\sqrt{190/05}$.

Rachael Brown

Dated: August 29, 2005

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